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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GERALD ELMER NAPOUK, individually
and as Co-Special Administrator of the Estate
of LLOYD GERALD NAPOUK; MARY
NAPOUK, individually and as Co-Special
Administrator of the Estate of LLOYD
GERALD NAPOUK and FREDERICK
WAID, as Co-Special Administrator of the
Estate of LLOYD GERALD NAPOUK,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; BUFORD KENTON;
CAMERAN GUNN and DOES 1-10,
inclusive,

Defendants.

Case Number:

2:20-cv-01859-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINES (FIRST REQUEST)**

Pursuant to LR 1(A) 6-1, Plaintiffs, by and through their counsel of record, Peter Goldstein, Esq. of Peter Goldstein Law Corp. and Defendants, by and through their counsel of record, Craig R. Anderson, Esq. of Marquis Aurbach Coffing, submit this Stipulation and Order to Extend Dispositive Motion Deadlines (First Request). The parties respectfully request that the dispositive motion deadline be extended by thirty (30) days.

Currently, the dispositive motion deadline is December 8, 2021. (ECF No. 23) The parties respectfully request that the dispositive motion deadline be extended until January 7, 2022. Similarly, the parties hereby request that the last day to file a Joint Pre-Trial Order shall be extended thirty (30) days or until February 7, 2022. In the event dispositive motions are filed, the date for filing the Joint Pre-Trial Order shall be suspended until thirty (30) days

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1 after decision on the dispositive motions or upon further Order by the Court extending the
2 time period in which to file the Joint Pre-Trial Order.

3 The parties state that, pursuant to Local Rule 6-1, that good cause exists for the
4 requested extension. The parties agreed to take the depositions of the respective experts
5 after the close of discovery. The depositions have now occurred but the parties are waiting
6 on receiving the transcripts. The experts' deposition transcripts are necessary to the filing of
7 proper motions for summary judgment.

8 Further, the parties believe that dispositive motions may resolve several of the claims
9 (and maybe the entire case) and therefore could conserve judicial resources.

10 This extension request is made in good faith, jointly by the parties, and not for the
11 purposes of delay. Trial in this matter has not yet been set. Moreover, since this request is a
12 joint request, neither party will be prejudiced.

13 This is the first request for extension of the dispositive motion deadline in this
14 matter. The parties respectfully submit that the reason set forth above, constitute compelling
15 reasons for the extension.

16 WHEREFORE, the parties respectfully request that this Court extend the deadline to
17 file dispositive motions in the above-captioned case for thirty (30) days, up to and including
18 January 7, 2022.

19 IT IS SO STIPULATED this 30th day of November, 2021.

20 MARQUIS AURBACH COFFING

PETER GOLDSTEIN LAW CORP.

21 By: s/Craig R. Anderson
22 Craig R. Anderson, Esq.
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26 Attorney for Defendants LVMPD, Sgt.
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By: s/Peter Goldstein
Peter Goldstein, Esq.
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10161 Park Run Drive, Ste. 150
Las Vegas, Nevada 89145
Attorney for Plaintiffs

Order

IT IS SO ORDERED

DATED: 9:56 am, December 01, 2021



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE